

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH McMULLIN,

Defendant.

Case NO. 11-CR-20345.

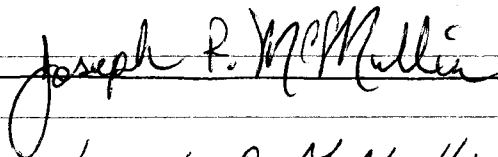
MOTION FOR APPOINTMENT OF COUNSEL AND
PRODUCTION OF MEDICAL RECORDS

Comes Now, the defendant Joseph McMullin, pro se, and hereby moves the Court to arrange for the appointment of Counsel pursuant to the Criminal Justice Act. In support of the Appointment of Counsel, the defendant states that he is a layman to the law and thus lack the expertise to litigate this matter effectively. Similarly, as the prison is on "lock-down" the defendant is without access to the law library. Therefore, the defendant lack the present ability to research and develop a Reply to any Response that may be filed by the Government. And the issue is one deserving of review by the Court as presented by a licensed attorney. Further, defendant is without adequate funds to retain Counsel and every effort to secure pro bono Counsel has been

Unavailing. The defendant further moves the Court for an order directing the Federal Bureau of Prisons to release to Court appointed Counsel all medical records of the defendant's that are necessary for the resolution of the accompanying "Motion For Compassionate Release." The defendant's efforts to secure such medical records on his own were not successful. And the absence of the medical records would result in substantial prejudice.

08-16, 2020.

Respectfully Submitted,



Joseph P. McMullin

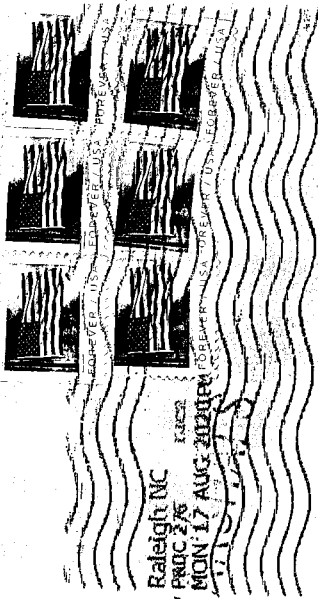
45825-039

Butner Medium II

P.O. BOX 1500

Butner, NC 27509

JOSEPH P. McMULLIN #45825-039
FEDERAL CORRECTIONAL INSTITUTION 2
P.O. BOX 1500
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8/17/20

Hon. Judge Arthur J. Tarnow
THEODORE LEVIN U.S. Courthouse
231 WEST LAFAYETTE BLVD. - ROOM 124
DETROIT, MICHIGAN 48226

